

AO 91 (Rev. 11/11) Criminal Complaint

FILED

FEB - 8 2016

UNITED STATES DISTRICT COURTfor the
Western District of TexasCLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY K. J. V.
DEPUTY

United States of America)

v.)

JAMES TAYLOR, Jr.)

Case No. 5:16-MJ-81)

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 5, 2016 in the county of Kendall in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*Title 18 United States Code Section
1708

Possession of Stolen Mail

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.K. D. Lara, USPS*Complainant's signature*

INSPECTOR KATHRYN D. LARA, USPS

Printed name and title

Sworn to before me and signed in my presence.

Date: 2/8/2016H. J. Bemporad*Judge's signature*City and state: San Antonio, Texas

HENRY J. BEMPORAD U.S. MAGISTRATE JUDGE

Printed name and title

Up to 5 years confinement, a fine not to exceed \$250,000.00, a maximum of three years supervised release, and a \$100 special assessment.

ATTACHMENT "A"

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

I, Kathryn D. Lara, being duly sworn, do hereby depose and state:

1. I have been a United States Postal Inspector for approximately twenty years. I am currently assigned to the Houston Division Office in San Antonio, Texas. As part of my duties I investigate identity theft, bank fraud, wire fraud, and theft of mail in violation of Title 18, United States Code, Section(s) 1708. I have participated in investigations, the service of search warrants, the interviewing of suspects, witnesses, informants and other persons having knowledge of violations of the Federal Criminal Code. Throughout this investigation, I have been made aware of additional information concerning other crimes which is not included in this affidavit.

2. On or about August 22, 2015, at approximately 5:50am, a white male subject, later identified as JAMES TAYLOR, was seen on video entering the mail room at the Savannah Oaks Apartments, located at 14838 Vance Jackson, San Antonio, TX 78249. Taylor accessed numerous mailbox apartment panels with what appeared to be an Arrow Key (a restricted, controlled key used only by the US Postal Service (USPS), in violation of Title 18 USC Section 1704 (Possession of USPS Arrow Key). He was seen leaving the apartment complex in a silver Toyota Tacoma.

3. On or about January 5, 2016, at approximately 5:15am, James Taylor was witnessed parking his Toyota Tacoma pickup truck at the Toyota of Boerne dealership located at 31205 W. IH10, Boerne, Kendall Co.,TX. The witness advised he saw the

vehicle pull up to the dealership, black out its lights, and noticed two individuals exit the truck with flashlights.

4. The witness notified the Boerne Police Department and units were dispatched to the Toyota dealership. When the police arrived, they located a silver, 2002, Toyota, Tacoma, Texas license plate DMT3955, registered to James Taylor, Jr. parked at the dealership.

5. Identified inside the vehicle was a female named Brittany Snider. Officers located James Taylor and a male named Tracy Cooper inside the dealership parking lot. It appeared that Taylor and Cooper were tampering with vehicles on the lot and were found to have burglary tools on their persons. All three were arrested and charged with Engaging in Organized Criminal Activity.

6. The Toyota Tacoma was towed to the Boerne PD for inventory incident to arrest. Found inside Taylor's truck, was a briefcase containing US Mail belonging to persons other than Taylor in violation of 18 USC Section 1708. The mail was stolen from the 78240 zip code area of San Antonio. According to the Also found inside the briefcase, were two sets of keys belonging to the USPS. One was an Arrow key (SN: 80 40679) which opens all the apartment and neighborhood mailboxes in the San Antonio area. The other key was an MVS (Motor Vehicle Services) (SN: 49220) key used to open special pad locks located on blue collection boxes in rural areas in and around of San Antonio.

7. According to USPS records, the Arrow key and the MVS key were reported missing from the postal service in 1994. The keys were assigned to the Thousand Oaks Post Office located at 15610 Henderson Pass, San Antonio, TX 78232.

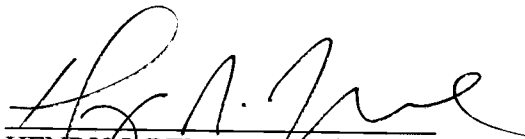
8. On or about January 29, 2016, retired Postal Supervisor James Taylor, Sr. was interviewed regarding his son James Taylor, Jr. During the interview, Mr. Taylor advised he was a Postal Supervisor at the Thousand Oaks Post Office from approximately 1990 to 2000. The USPS keys were reported missing during the time frame that Mr. Taylor Sr. was employed with the postal service.

9. I swear the information contained in this affidavit is true to the best of my knowledge and belief.



KATHRYN D. LARA
US Postal Inspector

SWORN to and subscribed before me this 8th day of February, 2016.



HENRY J. BEMPORAD
UNITED STATES MAGISTRATE JUDGE